



Working to Protect and Preserve the Gulf of Mexico

338 Baronne St., Suite 200, New Orleans, LA 70112
Mailing Address: P.O. Box 2245, New Orleans, LA 70176
Phone: (504) 525-1528 Fax: (504) 525-0833
www.gulfrestorationnetwork.org

March 31, 2003

Rebecca Kane
U.S. EPA
Office of Enforcement and Compliance Assurance
Mail Code 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: EPA's Enforcement Compliance History Online (ECHO) database

Dear Ms. Kane:

I am submitting these comments on behalf of the Gulf Restoration Network (GRN), a network of over 45 local, regional, and national groups dedicated to uniting and empowering people to protect and restore the resources of the Gulf region.

We strongly support the decision by the EPA to establish the ECHO database and make it readily accessible to the general public. As an organization, the GRN often monitors and submits comments on TMDLs, 404 permits, 401 Water Quality Certifications, 303(d) lists, etc. It is extremely important for us to be able to access compliance information to make sure that the agencies are considering all relevant information in their decision making processes. Our members are also very concerned about these issues, and a database such as ECHO allows them to research local environmental quality issues more quickly and thoroughly. The ECHO database is definitely a good start and it gives the public enforcement information that may affect their health and quality of life. We appreciate all of the hard work that went into getting the database to this point and look forward to working with EPA to improve it over time.

In general, all of the information provided is useful, particularly the inspection history, compliance status, enforcement actions and demographic profiles. However, we believe the database would be improved by including additional information. For example, the details of the Clean Water Act (CWA) compliance status, including significant noncompliance designation and the percentage by which specific pollutants exceeded permit levels at specific discharge points by quarter are critical pieces of information. Another area in which the database could be improved is by extending the timeframe considered from two years to five. At least this much data is needed to be able to see trends in or characterizations of a facility's compliance record. We understand that the process of assuring the quality of and inputting the data takes time, and therefore we hope

that this process will begin immediately. We also recommend that the ECHO database be expanded to include CAFOs, pretreatment and stormwater permit compliance information as those data become available.

More specifically, we would like to see the Inspection History section expanded to include the identity of the pollutants tested in the case of stack tests or effluent sampling. The pollutant levels found in the test and each pollutant's permit limit should be listed as well. Furthermore, the database should also present the results of each inspection conducted. Under the Two Year Compliance Status by Quarter section, we are very pleased to see that the permit exceedance by pollutant by quarter is quantified for CWA violations. Recording the highest percentage by which a permit limit is exceeded under the CWA is very useful because it allows citizens to see the extent to which a violation poses a public health concern. However, while the percentage by which a permit is exceeded is helpful, it really provides only half of the picture. The other half is the permit limit. Together they would give a much more accurate picture of the potential risks associated with any given violation.

As to be expected, there are many acronyms used in the database, especially in the compliance status sections. In order to make the database more user-friendly, the data dictionary should be shown in a pop-up screen so that the acronym explanations can be viewed at the same time as the facility report. It is time consuming and confusing to have to jump back and forth.

We thank you for this opportunity to comment on the ECHO database. We would like to reiterate how pleased we are that you have decided to provide this information to the public and we look forward to seeing how the system improves in the future.

Sincerely,

[by e-mail]

Vicki E. Murillo
Gulf Restoration Network